In the ***Response to Arguments*** portion of the final rejection, the Examiner, in connection with Applicants' comment that the "Examiner has used words different from those in the rejected claims and has failed to relate the words used in the claims," states that she "does not know to which words the Applicant is referring." Applicants pointed out at page 3 of the Amendment dated June 12, 2002 that "the Examiner has used words which are not on point and has failed to explain how these words used by the Examiner have the same meaning as the words specified by the rejected claims." Applicants will again identify what they have referred to previously but will do so in response to the comments of the Examiner in the ***Response to Arguments*** portion of the final rejection.

Response to Arguments Second Paragraph on page 6 of Office Action

Claims 1, 2, 5, 6, 9, 13, and 14 specify

"generating the grid as a direct result of data values"

and claims 3, 7, 11, and 15 specify

"a mathematical matrix generated as a direct result of data values"

The first limitation of Applicants' claims 1, 2, 5, 6, 9, 13, and 14 can be considered in two parts: (1) generating the grid (2) as a direct result of data values. The second limitation of Applicants' claims 3, 7, 11, and 15 also can be considered in two parts: (1) a mathematical matrix generated (2) as a direct result of data values.

According to the Examiner, Schwuttke et al., "teaches generating a grid .... that displays objects representative of a plurality of telemetry data representing nominal values" and cites column 12, lines 25 through 31 of Schwuttke et al. for this teaching. Column 12, lines 25 through 31 of Schwuttke et al. specifies "generating of a **display** of a three-dimensional cyberspace universe including upper and lower grids" (emphasis added). Generating a *display* is different from generating a *grid*. A grid is a framework or structure or a reference into which data can be introduced, so

that the data can be displayed when the display is generated by the introduction of the data. The grid exists before the data is introduced, so the grid is not generated by the data --- only the display of the data is generated by the introduction of the data. There is no thought at column 12, lines 25 through 31 of Schwuttke et al. of generating a grid and much less generating a grid based on data values, as called for by Applicants' claims, at column 12, lines 25 through 31 of Schwuttke et al. or anywhere in Schwuttke et al.

The same comments apply with respect to the limitation of claims 3, 7, 11, and 15 set out above.

Response to Arguments Third Paragraph on page 6 of Office Action

According to the Examiner, in Schwuttke et al.

"the telemetry data is associated with a mathematical matrix because it is displayed in row/column format," and

"the telemetry data is used to generate and display a grid," and

"the grid created is representative of the claimed 'geometric representation'"

Column 12, lines 25 through 31 of Schwuttke et al. again is cited by the Examiner and Applicants response again is that this portion of Schwuttke et al. describes generating a display. The data, telemetry or otherwise, is not used to generate a grid.. There is no thought of generating a grid and much less by extracting a plurality of data values associated with a mathematical matrix to generate a geometric representation, as called for by Applicants' claims, at column 12, lines 25 through 31 of Schwuttke et al. or anywhere in Schwuttke et al. Because there is no grid created or generated from the data values in Schwuttke et al., no grid, representative of the claimed 'geometric representation' is created by Schwuttke et al. as asserted by the Examiner.

Response to Arguments Second Paragraph on page 7 of Office Action

The Examiner's contends that Schwuttke et al. discloses "visualization of a mathematical representation in grid or matrix form ..... because he displays in a grid telemetry data (i.e. math/data values) ....." Schwuttke et al. does, indeed, disclose visualization of data in grid or matrix form but does not disclose visualization of a mathematical representation in grid or matrix form. Visualization of data introduced into a grid or matrix (as disclosed by Schwuttke et al.) is not visualization of a mathematical representation that is the basis upon which the grid or matrix is generated (Applicants' invention as defined by the rejected claims).

Response to Arguments Fourth Paragraph on page 7 of Office Action

Again, Schwuttke et al. does not generate a grid based on received telemetry data values. Schwuttke et al. introduces data values into a grid that is based on other than the data values to generate a display of the data values on the grid.

Response to Arguments First Paragraph on page 8 of Office Action

Schwuttke et al. configures the grid prior to generation of the display and Schwuttke et al. generates the display, not the grid as asserted by the Examiner, as a result of receiving data values.

Response to Arguments Second Paragraph on page 8 of Office Action

The Examiner made the statement in the ***Response to Arguments*** on page 7 of the August 28, 2001 Office Action.

Response to Arguments Third Paragraph on page 8 of Office Action

By specifying the following claim features:

"generating the grid as a direct result of data values" (claims 1, 2, 5, 6, 9, 13, and 14), and

"a mathematical matrix generated as a direct result of data values" (claims 3, 7, 11, and 15)

"the claimed grid is defined at coordinates where the data is located."

Applicants submit that because the claims specify that the grid is generated as a direct result of data values, the claims make very clear, particularly to one skilled in the art, that Applicants' grid is defined at coordinates where the data is located. Nevertheless, Applicants are willing to amend the claims to add words to the effect that "the claimed grid is defined at coordinates where the data is located" if the Examiner believes that such amendments to the claims will better define the distinction between Applicants' invention and Schwuttke et al. The Examiner is requested to suggest an amendment to the claims if she thinks that such an amendment will advance this application to allowance.

Respectfully Submitted,

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The Assistant Commissioner for Patents is hereby authorized to charge payment to Deposit Account No. 09-0456 (IBM Corporation) of any fees associated with this communication.

I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office (Fax No. (703) 308-6606) on the date shown below.

November 5, 2002
Lisa M. Cooper